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Attorneys for Defendant,
MERCEDES-BENZ USA, LLC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JUAN MARTINEZ GOMEZ, an individual, and MARTINEZ CART, INC., an individual.

PlaintiffS,
VS.

MERCEDES-BENZ USA, LLC., a Delaware Corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No: 2:25-CV-00046-PD

Magistrate Judge: Hon. Patricia Donahue

JOINT NOTICE OF SETTLEMENT

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that Plaintiffs, JUAN MARTINEZ GOMEZ and
3 MARTINEZ CART, INC., and Defendant, MERCEDES-BENZ USA, LLC., (the
4 “Parties”), jointly, write to advise this Court that they have settled this matter. The
5 Parties request that the Court vacate any upcoming hearings and deadlines while the
6 performance of the settlement terms is pending.

7 Once all terms of the settlement are completed and payment is received by
8 Plaintiff, the Parties shall file an executed Stipulation of Dismissal of the entire action
9 with prejudice. The Parties expect to file the dismissal papers within 90 days.

10 Based on the foregoing, the Parties respectfully request that the Court Order that
11 this action be dismissed without prejudice and the Court continue to retain jurisdiction
12 over this action to enforce the terms of the settlement agreement.

14 Dated: February 5, 2025,

15 QUILL & ARROW LLP

16 By _____

17 Kevin Y. Jacobson, Esq.
18 Luis A. Serrano, Esq.
19 Attorneys for Plaintiffs,
JUAN MARTINEZ GOMEZ
MARTINEZ CART, INC.

20 Dated: February 6, 2025,

21 MERCEDES-BENZ USA, LLC

22 By: _____

23 /s/*Mehgan Gallagher*
24 Soheyl Tahsildooost, Esq.
Mehgan Gallagher, Esq.
25 Attorneys for Defendant,
MERCEDES-BENZ USA, LLC.